

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

BRIAN CONWAY individually and on
behalf of all others similarly situated,

Plaintiff,

v.

MAPFRE U.S.A. CORP. and THE
COMMERCE INSURANCE COMPANY,

Defendants.

Case No.: 1:23-cv-12076-IT

**JOINT STIPULATION TO EXTEND TIME
TO RESPOND TO CLASS ACTION COMPLAINT**

IT IS HEREBY STIPULATED and AGREED by and between undersigned counsel,
pursuant to Federal Rule of Civil Procedure 6(b), that:

1. Defendants MAPFRE U.S.A Corporation's and The Commerce Insurance Company's ("Defendants") time to answer, move, or otherwise respond to Plaintiff's Class Action Complaint filed on or about September 11, 2023 ("Complaint") and served on September 19, 2023, is extended from October 10, 2023 to November 9, 2023.

2. Good cause exists for the agreed extension because Plaintiffs have filed an unopposed Motion to Consolidate multiple related putative class actions brought against Defendants in this Court in the related case, *Ma v. MAPFRE U.S.A Corp., et al.*, No. 1:23-cv-12059 (Dkt. No. 9). That motion also requests a deadline for Plaintiffs to file a Consolidated Complaint and for Defendants to file a responsive pleading to the Consolidated Complaint.

3. This stipulation does not constitute a waiver of any claim, right or defense.

Dated: October 9, 2023

Respectfully submitted,

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/s/ Andrew W. Ferich (with permission)

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